

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOHN DOE,

Plaintiff.

v.

UNIVERSITY OF CHICAGO,

Defendant.

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Civil Case No. 1:22-cv-05273

Judge Martha M. Pacold

JOINT STATUS REPORT

Plaintiff John Doe, by and through his attorneys Nesenoff & Miltenberg LLP, and Defendant University of Chicago, by and through its attorneys Husch Blackwell LLP, submit this Joint Status Report in accordance with the Court's March 30, 2023 Order. Dkt. 57.

I. Background: This lawsuit alleges gender discrimination against the University of Chicago under Title IX (Count I); breach of contract (Count II); and promissory estoppel (Count III). On March 22, 2023, this Court denied Plaintiff's motion for preliminary injunction; further, the Court granted in part and denied in part Defendant's motion to dismiss, dismissing Plaintiff's claims for breach of contract and promissory estoppel. Dkt. 53. Plaintiff filed his amended complaint on April 12, 2023, asserting the same three causes of action. Dkt. 58. Defendant moved to dismiss Counts II and III, and that motion is fully briefed and awaiting decision. Dkt. 59, 60, 63, 64.

II. Progress of Discovery: Pursuant to the Court's March 30, 2023, Order, the Parties served initial disclosures and written discovery requests on May 1, 2023. The Parties exchanged responses to those written discovery requests in late May and early June 2023. The Parties have also conferred upon a protective order and have now agreed on its contents. The motion for entry of that protective order will be filed contemporaneously with this Status Report. Upon entry of the protective order, the Parties are prepared to begin exchanging documents. No depositions have

been scheduled, but the Parties are prepared to promptly schedule them following the exchange of documents.

III. Status of Settlement Discussions: On June 6, 2023, Plaintiff made an initial settlement demand, which Defendant rejected on June 15, 2023. On June 19, 2023, Plaintiff made a revised settlement demand. On June 27, 2023, Defendant declined that demand and proposed a counter-offer, along with an indication that Defendant would be willing to mediate if Plaintiff thought it would be beneficial. That counter-offer remains under consideration by Plaintiff.

Date: July 14, 2023

Respectfully submitted,

JOHN DOE

By: /s/ Andrew T. Miltenberg

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that he caused the foregoing document to be filed with the Clerk of the Court using the CM/ECF system, which will send electronic notification to all registered counsel of record this 14th day of July, 2023:

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